FILED
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CLERK U.S. DISTRICT COURT
ALEXANDRIA, VIRGINIA

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No. 1:18-CR 457 AJT
	)	
BIJAN RAFIEKIAN	)	
	)	
Defendant.	)	

NON-PARTY COVINGTON & BURLING LLP'S MOTION TO QUASH IN PART

Non-Party Covington & Burling LLP respectfully moves the Court, pursuant to Federal Rule of Criminal Procedure 17(c), for an order quashing Item 8 of Defendant's subpoena dated March 5, 2019 served on Covington, which calls for the production of the firm's entire client file for its client, Flynn Intel Group, Inc. Production of the entire file would violate the client's attorney-client privilege and work product protections and would be unreasonably burdensome and oppressive. The grounds for this Motion are set forth in the accompanying memorandum and declaration of Robert Kelner (with exhibits).

A proposed order is attached.

March 15, 2019

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I, Daniel E. Johnson, hereby certify that on the 15th Day of March, 2019, a true copy of the foregoing was served via hand delivery to the following:

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